

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF MASSACHUSETTS**

C.A. NO. 05-40075FDS

DANIEL HOUDE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ROBERT TURGEON, STEPHEN GUNNERSON,	)	
KEVIN JOHANSON, MATTHEW D'ANDREA,	)	
BRIAN HALLORAN, THOMAS DUFFY,	)	
SEAN MCCANN and CITY OF WORCESTER	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

Plaintiff Daniel Houde hereby requests the following voir dire questions per the Court's January 4, 2008 Order:

- (1) Please provide the name of all towns or cities in which you have lived for the past ten years.
- (2) Please state the name of all employers you have had for the past ten years.
- (3) Please state your entire educational background.
- (4) Please state your marital status.
- (5) Please state the name of all employers of your spouse for the past ten years.
- (6) Do you, your spouse, any family members or close friends now work for any law enforcement department or agency.
- (7) Have you worked at any time for any law enforcement department or agency.

- (8) Has your spouse, any family members or close friends ever worked for any law enforcement department or agency.
- (9) Are you more likely to believe the testimony of a police officer rather than a civilian because of the position he or she holds?
- (10) Have you or your spouse ever been involved in a lawsuit? If yes, please specify the type of lawsuit and whether you were a plaintiff or defendant.
- (11) Do you, your spouse, any family members or close friends now work for any court or governmental agency? If yes, please specify.
- (12) Do you have any bias towards plaintiffs in civil lawsuits?
- (13) Have you been exposed to any of the parties or claims in this matter through the media?

Respectfully submitted,

**PLAINTIFF DANIEL HOUDE,**

By his attorney,

/s/ Timothy J. Perry

Timothy J. Perry (BBO #631397)

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**Certificate Regarding Service**

I hereby certify that this document was served upon all counsel of record by the Court's ECF system.

Date: January 23, 2008

/s/ Timothy J. Perry  
Timothy J. Perry